

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TEXAS GUARANTEED STUDENT)	
LOAN CORPORATION,)	CIVIL ACTON NO.
Plaintiff,)	
V.)	06-CV-11495(WHP) (THK)
)	(ECF Case)
MERCER STREET BOOKS, INC.,)	
Defendant.)	
)	December 6, 2007

MOTION FOR JUDGMENT UPON DEFAULT

Pursuant to Fed. R. Civ. P. 55(b)(1), the Plaintiff, Texas Guaranteed Student Loan Corporation ("Plaintiff") in the above-captioned action respectfully requests that judgment be entered against the Defendant for failure to appear or defend this action. The Plaintiff's claim is for a sum which can, by computation, be made certain. This motion is supported by the Affidavit of Kaye Worrell ("Affidavit of Debt"), which attests to the sum certain amounts due to the Plaintiff. The Affidavit of Debt is attached hereto and incorporated herein as Exhibit 1.

In support of this motion, Plaintiff would show the following:

1. A default was entered against the Defendant on November 30, 2007 for failure to appear in this action. The Clerk's Certificate is attached hereto and incorporated herein as Exhibit 2.
2. To the date of this motion, the Defendant has not appeared in this action.

3. As set forth in the Affidavit of Debt, as of the date of this motion, Defendant owes Plaintiff a total of \$9,625.02 on account of the student loan debt.

4. As demonstrated by the Affidavits of Attorneys' Fees attached hereto as Exhibits 3 and 4, Plaintiff has incurred attorneys fees and costs totaling \$21,094.97 to prosecute this action.

WHEREFORE, Plaintiff respectfully requests that judgment enter against Defendants in this matter in the total amount of \$30,719.99.

Respectfully submitted,
PULLMAN & COMLEY, LLC

By: /s/ Jessica Grossarth
Keith N. Costa
Jessica Grossarth (JG1138)
850 Main Street, P.O. Box 7006
Bridgeport, CT 06601-7006
203-330-2215 Fax 203-576-8888
ATTORNEYS FOR PLAINTIFF
Texas Guaranteed Student Loan Corporation

CERTIFICATION

I hereby certify that on December 6, 2007, a copy of the foregoing was sent by first class, U.S. Mail, to:

Mercer Street Books, Inc.,
c/o Wayne T. Conti
206 Mercer Street
New York, New York 10012

Carol Calhoun
46 Carmine Street
New York, NY 10014

/s/ Jessica Grossarth
Jessica Grossarth

Bridgeport/71256.1/JXG/662771v1